

Charles D. Kist
Dated: 9/14/2021

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re

SARAH E. TOMPKINS

Debtor

Chapter 7

Case No. 21-30277-EDK

CHAPTER 7 TRUSTEE'S APPLICATION TO RETAIN BK GLOBAL REAL ESTATE SERVICES AND KELLER WILLIAMS REALTY AS REAL ESTATE BROKER

Now comes Gary Weiner, Chapter 7 Trustee (the "Trustee") for the above referenced bankruptcy estate of Sarah E. Tompkins (the "Debtor") by and through the undersigned counsel, hereby files this Application for entry of an order authorizing employment of (1) BK Global Real Estate Services ("BKRES") under the terms set forth in the agreement (the "BKRES Agreement") attached to BKRES' Affidavit as ***Exhibit A*** (the "BKRES Affidavit") and (2) Keller Williams Realty ("Listing Agent") under the terms of the agreement (the "Listing Agreement") attached to Listing Agent's Affidavit as ***Exhibit B*** (the "Listing Agent Affidavit"). In support thereof, the Trustee respectfully states as follows:

PRELIMINARY STATEMENT

Trustee requests approval to retain BKRES and local licensed Listing Agent (individually and collectively referred to as "Broker or Brokers"), at no cost to the estate, to negotiate with and persuade the first lienholder on certain real property in which the estate has no equity to (1) allow Trustee to sell such property at the highest price that the market will bear, (2) waive the resulting deficiency claim and (3) pay an 11 U.S.C. § 506 surcharge to provide a carve out for the benefit